

July 2, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W) Re: Business Opportunity Rule, R511993 600 Pennsylvania Avenue, NW Washington, DC 20580 RE: Business Opportunity Rule, R511993

<https://secure.commentworks.com/ftc-bizopNPR/1>

Dear Sir or Madam:

I am writing this letter because I am concerned about the proposed Business Opportunity Rule R511993. I believe that in its present form, it could prevent me from continuing as a Pre-Paid Legal Services, Inc. representative. I understand that part of the FTC's responsibilities is to protect the public from "unfair and deceptive acts or practices," but some of the sections in the proposed rule will make it very difficult if not impossible for me to sell Pre-Paid Legal Service Plans.

One of the most confusing and burdensome sections of the proposed rule is the seven day waiting period to enroll new associates. Many times my recruits have excitement built after seeing and/or using the services we offer in their personal lives and are anxious to join our company. A waiting period stands to have these recruits lose the enthusiasm that gets their business off and running. Many potential recruits are familiar with direct sales and look at several different companies before making a decision, adding on another 7 days gives the impression that we are doing something illegal.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. Today, anyone or any company can be sued for almost anything. It does not make sense to me that I would have to disclose these lawsuits unless Pre-Paid Legal Services is found guilty. Otherwise, Pre-Paid Legal Services, Inc. and I are put at an unfair advantage even though we have done **nothing** wrong. Frivolous lawsuits and Identity Theft are two of the biggest problems in our nation that Pre-Paid Legal Services is helping combat with the services we offer.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior purchasers nearest to the prospective purchaser. I am glad to provide references, but in this day of identity theft (which is one of the biggest things our services help our customers with), I am very uncomfortable giving out the personal information of individuals (without their approval) to strangers. Also, giving away this information could damage the business relationship of the references who may be involved in other companies or businesses including those of competitors. In order to get the list of the 10 prior purchasers, I will need to send the address of the prospective purchaser to our headquarters and then wait

for the list. I also think the following sentence required by the proposed rule will prevent many people from wanting to sign up as a salesperson "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers." People are very concerned about their privacy and identity theft. They will be reluctant to share their personal information with individuals they may have never met.

I have been with Pre-Paid Legal Services, Inc. for a little over one year. I have no previous Direct Selling experience. I was very cautious and made sure I was educated about this opportunity prior to making my decision. I researched the company in depth on the internet, and by contacting Better Business Bureaus, and researching through the company's year-end reports and regular reports to the SEC. I also advise each potential recruit to conduct similar research. I inform them of the continuing costs and ups and downs of running a business. I recruit to build my business. I don't want associates who do not want to work the business. It is my opinion that individuals should do their "due diligence". We should not as a people or government have to "baby-sit" every citizen. I am happy to provide and do provide each prospective associate with all the information they need and/or request, but I should not be "forced" to do so by a rule.

I appreciate the work of the FTC to protect consumers, but I believe this proposed new rule has many unintended consequences and that there are less burdensome alternatives available in achieving its goals.

Thank you for your time in considering my comments.

Sincerely,

Ron Sanders
